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January 25, 2010

Mr. Paul E. Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

Testimony in support of the Proposed Stream Flow Standards and Regulations

Dear Mr. Stacey:

As a Cos Cob resident and member of the Mianus Chapter of Trout Unlimited, I am writing today to express my support for the Proposed Stream Flow Standards and Regulations.

The importance of the Proposed Stream Flow Standards and Regulations, and the impact they will have of improving the quality of one of our state's most precious natural resources, cannot be emphasized enough.

Given the 30 years since Connecticut's regulations were last modified, the time is now to implement stream flow standards which will help preserve and improve the state's rivers and streams while providing protection to water supplies for human needs.

Water is a public resource. It belongs to the residents of Connecticut and must be protected and preserved for human uses, but also for ecological health and recreational enjoyment. It is a quality of life issue important to all Connecticut residents.

There is plenty of water to go around and these regulations will help lead the way to improved water management in the state.

The current regulations do not adequately protect the fragile ecology of our rivers and streams. Rivers in Connecticut face an abundance of threats from development, over consumption, poor water management, pollution and other factors. The proposed regulations will ensure that a consistent, adequate flow will exist in all of Connecticut's rivers and streams, providing the needed habitat to allow trout and other species to survive and thrive.

That the proposed regulations will apply to all rivers in Connecticut is a major step in protecting the health of our rivers and streams.

The proposed flow requirements also take into account the natural high and low flow periods present in any given year, and recognize that water releases must be made to

more closely match these naturally occurring cycles. Such natural flows will have a significant impact on the quality and health of the ecosystem.

Also crucial to the success of the proposed regulations is the inclusion of standards for groundwater withdrawal.

The majority of us depend on groundwater for drinking and other uses, putting enormous pressure on groundwater reserves and drawing resources from those streams that support wild trout.

It is important to ensure that groundwater withdrawals do not result in flow reductions in nearby streams, or even worse, the complete drying out of a streambed, which has been known to happen. At the lowest flow periods, when the stress is greatest on trout and other aquatic life, cutting back or eliminating groundwater withdrawals which would impact stream flows is essential.

I am pleased to see that a classification process is included in the proposed regulations that would be conducted over five years, allowing public input. It is important that all voices are heard during this classification period.

It is also encouraging that the proposed regulations will allow local water users to work with conservation groups, municipal officials and the state to develop individual watershed compacts which may be better suited for the particular needs of their communities and the specific environmental conditions of the region.

And the proposed regulations would allow for emergency takings of water in case of drought or other emergency, putting human water needs first during drought.

But there are areas where the proposed regulations should be strengthened, particularly when it comes to urban rivers which will likely be designated as Class 4 rivers.

It is my understanding that such a classification will provide virtually no stream flow protections for such rivers, severely limiting any chance that such streams can remain viable habitat for trout.

Just as the proposed regulations recognize that a one-size fits all approach is not the best solution and encourage individual flow management plans, they must also recognize that all urban rivers are not the same, and that even degraded rivers can be rehabilitated and restored. At the least, I encourage you to put in place standards, or a sliding scale within the Class 4 designation that would ensure the river's current health and level of aquatic life is sustained while measures are taken to improve the habitat further.

As an active and involved Trout Unlimited member, I know that restoration efforts can be successful at improving rivers throughout the state. I know that there is a strong desire to protect our rivers and a will to work together, as conservationists, to work to restore them.

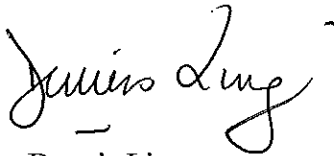
Please allow us the opportunity to make such improvements in our urban streams. Class 4 rivers can be brought back, but we need the water flows to be there to sustain the current level of life and allow for upstream passage once we have improved the habitat.

In closing, the Proposed Stream Flow Standards and Regulations represent an important step in ensuring an abundant supply of water for human use while protecting the ecological needs and recreational enjoyment of Connecticut's rivers and streams.

Balancing these needs is a difficult task, and the proposed regulations admirably create a standard that accounts for that balance.

I would ask that you carefully consider the proposed regulations in light of these and other public comments, with particular attention paid to the classification process, the need to provide at least minimal protection to Class 4 streams and the importance of including within the regulations a specific avenue for improving stream ecology.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dennis Ling".

Dennis Ling
340 Valley Rd. #3
Cos Cob, CT 06807

Mianus Chapter, Trout Unlimited